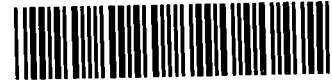


Patterson, Leslie

US EPA RECORDS CENTER REGION 5



505722

From: Brett.Fishwild@CH2M.com
Sent: Wednesday, July 03, 2013 12:47 PM
to: Patterson, Leslie
Subject: South Dayton Dump - additional thoughts on DQO/CSM review

Hello Leslie –

Dave and I as well as the eco and human health risk assessors have completed our reviews. We are compiling the comments into one Excel table now and will email that to you Monday morning. We also wanted to express some ideas in this email that do not fit into a specific review comment.

Table 3.1 (Soils and Fill); and overall

We commented in several places that an HHRA and ecological risk assessment is mandatory and should not be described "as needed." They will do an HHRA and ERA no matter what, for the screening level comparison. Did you intend that "if needed" wording to mean that a quantitative risk assessment may be need, if the screening level RA failed?

*they will do a ~~SLRA~~ on all media - some will be carried forward into the BURA
SLRA (and some areas, some not)*

Table 3.3 (Soil Gas)

There are several comments on the use of ODH values instead of USEPA values. CRA may have put that in there because of the previous OU1 interim measure VI work. If so, this should be clarified if this still holds true for OU2 and documented. Then overall, we assume that the current interim measure for VI is impacting/directing this DQO and since CH2M HILL is not advised of that work it is difficult for us to comment. It may be beneficial to have a discussion on this separately.

Overall

✓ The CSM was so incomplete (they completely left off all ecological components), it was hard to decide what to comment on now versus what to comment on in more detail later. As far as the Eco and HHRA issues go, another more in-depth review is needed after they digest these initial comments. They will need to then provide more information as to how they intend to approach the eco and HHRA assessment, that we will need to review.

I am available to discuss this email prior to the call if you like.

Thank you.

Brett A. Fishwild
Associate Project Manager
Geologist

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